

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

|  |   |                        |
|--|---|------------------------|
| In re:<br>THE FINANCIAL OVERSIGHT AND<br>MANAGEMENT BOARD FOR PUERTO RICO, | ) | PROMESA                |
|  | ) | Title III              |
|  | ) |                        |
|  | ) | No. 17 BK 3283-LTS     |
| as representative of   | ) |                        |
| THE COMMONWEALTH OF PUERTO RICO,   | ) | (Jointly Administered) |
| <i>et al.</i>  | ) |                        |
|  | ) |                        |
| Debtors.   | ) |                        |
|  | ) |                        |
| In re:   | ) | PROMESA                |
|  | ) | Title III              |
|  | ) |                        |
| THE FINANCIAL OVERSIGHT AND  | ) | No. 17 BK 4780-LTS     |
| MANAGEMENT BOARD FOR PUERTO RICO,  | ) |                        |
|  | ) |                        |
| as representative of   | ) |                        |
| PUERTO RICO ELECTRIC POWER   | ) |                        |
| AUTHORITY (“PREPA”)  | ) |                        |
|  | ) |                        |
| Debtor. <sup>1</sup>   | ) |                        |
|  | ) |                        |

**[PROPOSED] ORDER ON COBRA ACQUISITIONS LLC’S MOTION TO  
MODIFY STAY ORDER**

Upon *Cobra Acquisitions LLC’s Motion To Modify Stay Order* [ECF No. \_\_\_\_ in Case No. 17-BK-4780-LTS, the “Motion”),<sup>2</sup> and the Court having found and determined that (i) it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a), (ii) venue is

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion.

proper pursuant to PROMESA section 307(a), and (iii) due and proper notice of the Motion has been provided, and after due deliberation and good and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Stay Order is modified to permit Cobra to seek allowance of an administrative expense claim in respect of the Approved Unpaid Invoices.
3. The Stay Order is modified to permit litigation regarding Cobra's right to payment of the Available FEMA Funds if necessary.
4. The Court retains jurisdiction over any disputes relating to the interpretation, implementation and enforcement of this Order.
5. This Order resolved ECF No. \_\_\_\_ in Case No. 17-BK-4780.

SO ORDERED.

Dated: \_\_\_\_\_, 2023  
San Juan, Puerto Rico

\_\_\_\_\_  
LAURA TAYLOR SWAIN  
United States District Judge